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June 19, 1996

William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W., Room 222
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: RM No. 8811

Dear Mr. Caton:

In the above-referenced Petition for Rulemaking ("Petition"), Motorola Satellite Communications, Inc. ("Motorola Satellite") proposes: (i) reallocating the 37.5-38.6 GHz band to Fixed-Satellite Service ("FSS") downlinks; and (ii) adopting certain ITU Radio Regulation power flux density ("PFD") limits for the 37.5-40.0 GHz band. Pursuant to Section 1.405 of the Commission's Rules,¹ Alcatel Network Systems, Inc. ("ANS"),² by its attorney, hereby opposes grant of the Petition.

In an Opposition to Petition for Rulemaking filed concurrently herewith ("Opposition"), the Fixed Point-to-Point Communications Section, Network Equipment Division of the Telecommunications Industry Association ("TIA"), demonstrates that Motorola Satellite's proposals are premature, without merit, and therefore must be denied. TIA bases this opposition on the fact that: (i) Motorola Satellite has failed to demonstrate any need for the proposed reallocation; (ii) the reallocation would continue an unacceptable

¹47 C.F.R. Section 1.405 (1989).

²ANS is a wholly-owned subsidiary of Alcatel Alsthom ("Alcatel"), one of the world's largest corporations (with annual sales in excess of \$30 billion) and the world's largest manufacturer and supplier of telecommunications equipment. In particular, Alcatel is the world's largest independent manufacturer and supplier of microwave radios. Formerly Collins Radio and Rockwell International, ANS, with over \$750 million in annual sales, is a world leader in manufacturing microwave and light wave transmission systems. ANS' equipment is used for a wide range of services, including short, medium and long-haul voice, video and data transmission. Its microwave customers include all the Bell Operating Companies, most major independent telephone companies, cellular operators, power and other utility companies, oil companies, railroads, industrial companies, and state and local government agencies.

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trend of decreasing available spectrum for fixed point-to-point microwave service ("FS") users; and
(iii) the proposed ITU Regulations would not protect FS users from harmful interference. ANS concurs
with TIA.

Sincerely,



Robert J. Miller

RJM/dwt

cc: Michael D. Kennedy
Motorola Satellite Communications, Inc.

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